

From: [Marcus, Jacqueline](#)
To: [Frances Brunet Uriarte](#)
Cc: [Sonia Colón](#); [Gustavo Chico](#); [Schrock, Ray](#); [Fail, Garrett](#); [Singh, Sunny](#); [Hwang, Angeline](#)
Subject: RE: Re: 7:18-bk-23538 | Sears Holdings Corporation
Date: Monday, January 6, 2020 10:26:44 AM
Attachments: [image002.png](#)
[image003.png](#)

We will review and get back to you.



Jacqueline Marcus

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From: Frances Brunet Uriarte <fbrunet@ferraiuoli.onmicrosoft.com>
Sent: Sunday, January 5, 2020 10:45 AM
To: Marcus, Jacqueline <jacqueline.marcus@weil.com>
Cc: Sonia Colón <scolon@ferraiuoli.com>; Gustavo Chico <gchico@ferraiuoli.com>; Schrock, Ray <Ray.Schrock@weil.com>; Fail, Garrett <Garrett.Fail@weil.com>; Singh, Sunny <sunny.singh@weil.com>; Hwang, Angeline <Angeline.Hwang@weil.com>
Subject: RE: Re: 7:18-bk-23538 | Sears Holdings Corporation

Dear Attorneys,

In furtherance to the notice below, and in accordance with the *Amended Stipulated Protective Order* ("Order", Docket No. 1084), Santa Rosa Mall would like to confer in good faith for the removal of the "confidential" designation of a certain *Confidential Settlement and Release Agreement* (the "*Settlement Agreement*") prior to seeking relief from the Court. For ease of reference, both the *Order* and *Settlement Agreement* are attached hereto.

Please let us know whether the Debtors and Underwriters (*Settlement Agreement*, ¶ 9) are amenable to the forgoing.

Cordially,

Frances C. Brunet Uriarte

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From: Frances Brunet Uriarte

Sent: Tuesday, December 24, 2019 9:27 AM

To: Marcus, Jacqueline <jacqueline.marcus@weil.com>; Schrock, Ray <Ray.Schrock@weil.com>; garrett.fail@weil.com; Singh, Sunny <sunny.singh@weil.com>

Cc: Sonia Colón <scolon@ferraiuoli.com>; Gustavo Chico <Gchico@ferraiuoli.com>

Subject: Re: 7:18-bk-23538 | Sears Holdings Corporation

Attorneys,

On behalf of Santa Rosa Mall LLC ("Santa Rosa Mall"), we attach formal notice of its intent to file a request for relief from the automatic stay.

Cordially,

Frances C. Brunet Uriarte



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